

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

AMERICA SCIENCE TEAM RICHMOND, INC.,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Civil Action No. 3:22-cv-00451
	)	
ENOCH CHAN,	)	
	)	
<i>Defendant.</i>	)	

**PLAINTIFF’S NOTICE**

Plaintiff, America Science Team Richmond, Inc. (“**Plaintiff**” or “**AmeriSci**”), by counsel, and pursuant to this Court’s Order dated July 11, 2022 (D.N. 9), hereby submits this Notice (“**Notice**”) to provide the Court additional information pertaining to Plaintiff’s Motion for an Order Authorizing Service of Process by Electronic Communication (the “**Motion**”) (D.N. 3) against Defendant Enoch Chan (“**Defendant**” or “**Mr. Chan**”) and its prior notice (D.N. 8).

1. For a period of years, AmeriSci and Mr. Chan communicated with each other through e-mail regarding various issues, including Mr. Chan’s employment and the claims at issue in AmeriSci’s Complaint. In these communications, both AmeriSci and Mr. Chan used the e-mail address [enoch.chan@hotmail.com](mailto:enoch.chan@hotmail.com) for their correspondence.

2. AmeriSci’s most recent direct communication with Mr. Chan was set forth in Exhibit A of AmeriSci’s prior notice (D.N. 8).

3. Since then, Mr. Chan has avoided direct communication and has continued to evade service. As set forth in Exhibit C, attached, Mr. Chan’s most likely email is [enoch.chan@hotmail.com](mailto:enoch.chan@hotmail.com). Moreover, evidence showing Mr. Chan’s evasion of service is seen through Mr. Chan’s most recent address: 9169 W. State Street, Garden City, Idaho 83714 (the “**Address**”). The Address is a commercial building providing a mail forwarding service.

4. Similarly, AmeriSci and counsel for AmeriSci have engaged in e-mail correspondence with Mr. Chan's attorney for other matters, Stewart A. Sutton. There is no additional recent correspondence with Mr. Sutton beyond Exhibit B of AmeriSci's prior notice.

5. Given Mr. Chan's actions in evading service, AmeriSci alternatively requests additional time to respond to the Court's July 11, 2022, Order in order to subpoena records from Mr. Stewart A. Sutton to definitively indicate Mr. Chan's ability to obtain alternative service.

6. In addition, to the extent the Court needs additional information with respect to any communications with Mr. Chan or the difficulties in obtaining service over Mr. Chan, Plaintiff will provide the necessary information.

Dated: July 18, 2022

Respectfully submitted,

/s/ Stephen M. Faraci Sr.

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*Counsel for Plaintiff, America Science Team  
Richmond, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 18, 2022, I electronically filed this *Plaintiff's Notice* with the Clerk of the Court using the CM/ECF system. I also hereby certify that I have served a copy of the foregoing by electronic mail and by United States Mail, First Class, Postage Prepaid, to the following last known addresses:

Enoch Chan  
4110 Bowne Street, Apartment 6S  
Flushing, New York 11355  
Enoch.chan@hotmail.com

Enoch Chan  
9169 W. State Street  
Garden City, Idaho 83714-1733

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/s/ Stephen M. Faraci, Sr.

Counsel